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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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Case No. 09-44979 (ESS)

In Re:

Involuntary Chapter 7 Proceeding

LESSNO, LLC,

Alleged Debtor.

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**RESPONSE TO DEFENDANT’S MOTION
FOR SANCTIONS AND ATTORNEYS FEES**

The alleged Debtor, Lessno, LLC (“Lessno”) in response to the Petitioner’s Motion for Sanctions and Attorneys Fees states as follows:

1. The petitioning creditors continue their improper practice of repeatedly filing motions related to discovery without first attempting to meet and confer, and more importantly, without failing to consider the prior rulings of the Court.

2. As previously discussed in pleadings and in hearings throughout this case, the alleged Debtor (located in Bulgaria) has responded to various outstanding discovery requests. The only discovery left outstanding is the final round of discovery served by the petitioning creditors on the alleged Debtor. As noted at the last conference, the last round of requests is requiring an extensive search of the Debtor’s records. That search is ongoing. Nevertheless, the alleged Debtor has indicated which documents would be produced as directed by the Court.

3. The petitioning creditors continue posturing is inappropriate as it has diverted the alleged Debtor's attention from otherwise preparing the case and disregards the prior rulings and discussions of the Court in these matters. Moreover, the latest round of pleadings was filed without any satisfaction of meet and confer obligations.

4. For the foregoing reasons, it is respectfully requested that this Court deny the latest round of motions as both previously addressed, without merit and improperly asserted.

Respectfully submitted,

By: /s/ Michael J. Connolly, Esq.

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Dated: April 8, 2011

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